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December 30, 2020

Via ECF

Honorable Judge Ramon E. Reyes, Jr.
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. N208
Brooklyn, New York 11201

Re: Michael Ramos and Brian Rivera v. Steve Belsito Sons, Inc. et al.
Case No. 1:20-cv-03858-FB-RER

Dear Judge Reyes:

Our office represents the Plaintiffs, Michael Ramos and Brian Rivera, in the above-referenced matter. We write, with the consent of Defendants' counsel, to respectfully request a 29-day extension of the deadline to amend the complaint or join additional parties, from December 31, 2020 to January 29, 2021. This is Plaintiffs' first request for an extension of this deadline.

As mentioned previously during our conference call before Your Honor, Plaintiffs' counsel believes that Plaintiffs may have additional claims against Defendants under the Fair Labor Standards Act and the New York Labor Law. Plaintiffs' counsel is waiting to receive Defendants' responses to Plaintiffs' discovery requests and will review the responses before determining if Plaintiffs will be amending their complaint to include additional causes of action for wage violations.

Plaintiffs' counsel originally served our discovery requests to opposing counsel on November 20, 2020, and Defendants' responses were originally due on December 20, 2020. Plaintiffs granted Defendants' counsel an extension until January 5, 2021 to provide their discovery responses.

Therefore, Plaintiffs request an additional 29 days to amend the complaint, so Plaintiffs can review Defendants' discovery production and amend the complaint, if necessary.

We thank Your Honor for your attention to this matter and consideration of this request.

Respectfully submitted,

/s/ Brittany A Stevens
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